

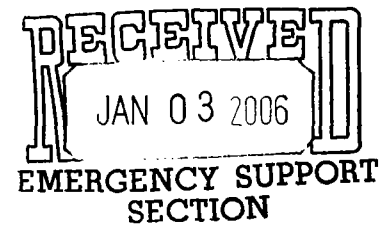


December 29, 2005

VIA United Parcel Service



U.S. Environmental Protection Agency  
Attn: Mrs. Mila V. Bensing  
Emergency Enforcement & Support Section, SE-5J  
77 West Jackson Boulevard  
Chicago, IL 60604-3590



Re: IWI Inc. Site, Summit, Illinois

Dear Mrs. Bensing:

In response to EPA's Request for Information concerning the IWI Inc. Site, enclosed is 3M Company's supplemental response.

As set forth in an earlier response, our investigation indicates that 3M did not arrange for the disposal or treatment or arrange for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site. Rather, IWI was a 3M vendor that provided refurbishing and repair services in connection with Intermediate Bulk Containers ("IBCs") that formerly contained raw materials or intermediates. It is our understanding that IWI sold the residues generated in the refurbishing process.

We have now completed our review of approximately 80 legible documents provided by EPA in response to 3M's FOIA request. The supplemental information is indicated by the color blue in the response. Please contact me if you have any questions.

Sincerely,

Robert A. Paschke  
Manager, 3M Corporate Environmental Programs

Enclosure

**SUPPLEMENTAL RESPONSE OF 3M COMPANY  
TO THE INFORMATION REQUEST FROM  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
DATED AUGUST 18, 2005 FOR THE  
IWI INC. SITE**

In response to the Information Request of the United States Environmental Protection Agency ("U.S. EPA"), dated August 18, 2005 and received August 23, 2005, relating to the IWI, Inc Site, Summit, Illinois, 3M Company ("Respondent") responds pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. S 9601 et seq. ("CERCLA"). U.S. EPA attorney, Jerome Kujawa, extended the time for this response to September 30, 2005.

Respondent states that Robert Paschke, Manager, Corporate Environmental Programs and staff of Respondent, including the Office of General Counsel, have been involved in preparing the responses to this Information Request. Respondent states as follows:

**General Response:**

1. Respondent continues to investigate this matter and will supplement this response once Respondent has examined and investigated the documents recently provided by EPA.
2. By responding to this information request, Respondent in no way admits and does not believe that it generated hazardous substances, pollutants or contaminants which were disposed of at the IWI, Inc. Site, and reserves and does not waive any and all rights and defenses.
3. Respondent objects to certain questions because they are overly broad, burdensome, not reasonably calculated to lead to information concerning the identification, nature and quantity of hazardous substances at the IWI Inc. Site, and seek information not in Respondent's possession.
4. Respondent objects generally to the questions to the extent they seek information protected by the attorney-client and work product privileges.
5. Respondent objects to these requests to the extent they assert that Respondent arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the IWI Inc. Site.
6. In response to information provided in a telephone conversation on August 30, 2005 between Jerome Kujawa, EPA Attorney, and George Ann Biros of 3M's Office of General Counsel, 3M's investigative efforts focused on the following entities: IWI, Inc.,

IWI Industries, Wellco and Itasco. Mr. Kujawa also reported that the site operated for approximately 40 years with operations ceasing in 1999. Respondent's documents indicate that IWI operations may have begun in 1974.

**Responses to Specific Requests:**

**Request 1. Identify all persons consulted in the preparation of the answers to these Information Requests.**

**ANSWER:** See Exhibit A

**Request 2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.**

**ANSWER:** Respondent objects to this Request as overbroad because it apparently requires Respondent to provide copies of all files and documents examined in preparing answers, regardless of whether such files or documents are responsive to the information requests. Without waiving this objection, in preparing the responses to these Requests, Respondent's relevant corporate records were reviewed. These included EHS Operations, plant files, packaging engineering files, purchasing files and contract files. 3M Office of General Counsel files were also reviewed. Documents received from EPA in response to 3M's FOIA request were also reviewed. All documents located during the investigation, which are responsive to these Requests, are attached hereto as Exhibit B.

**Request 3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.**

**ANSWER:** Respondent objects to Request No. 3 on the grounds that it is overbroad, unduly burdensome and beyond the scope of the statute because it seeks information that is irrelevant to the identification, nature and quantity of materials at the IWI Inc. Site. Further answering the request and without waiving the foregoing objection, 3M states that Glenn Wellman, IWI Industries employee, as indicated in Exhibit B may have knowledge. 3M documents also indicate that DuPont and Mobil may have been customers of IWI Industries. See 3M's General Responses.

**Request 4. List the EPA Identification Numbers of the Respondent.**

**ANSWER:** Respondent objects to this Request on the grounds that it is overbroad, unduly burdensome and beyond the scope of the statute because it seeks information

that is irrelevant to the identification, nature and quantity of materials at the IWI Inc. Site. Further, 3M objects to the Request to the extent it seeks information from or about 3M facilities other than those which may be associated with the IWI Inc. Site. Further answering the request and without waiving the foregoing objection, 3M states that the following EPA Identification Numbers may be applicable:

Bedford Park, IL	ILD006220123
Brownwood, TX	TXD001806868
Cordova, IL	ILD054236443
Knoxville, IA	IAD075846824
St. Paul, MN	MND000824029

**Request 5.** Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants, and damages resulting therefrom.

**ANSWER:** Respondent objects to this Request as it calls for speculation and/or legal conclusions. Respondent has no knowledge or information of any acts or omissions of any persons that may have caused a release or threat of release of any substances at the IWI Inc. Site.

**Request 6.** Identify all persons having knowledge or information about the generation, transportation, treatment, disposal, or other handling of hazardous substances by you, your contractors, or by prior owners and/operators.

**ANSWER:** To the extent that this Request seeks information unrelated to the IWI Inc. Site, Respondent respectfully objects on the grounds that the request is beyond EPA's statutory authority, overbroad, and not reasonably relevant to the IWI Inc. Site. Respondent also objects to this request to the extent it asserts that 3M arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site. Subject to and without waiving this objection, Respondent answers the Request as if directed to the IWI Inc. Site with the following information: Glenn Wellman, IWI Industries employee, as indicated in the attached documents (Exhibit B). 3M documents also indicate that DuPont and Mobil may have been customers of IWI Industries. See General Responses; see Answer to Request No. 7.

**Request 7. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials? If the answer to the preceding question is anything but an unqualified “no”, identify:**

- a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;**
- b) Who supplied you with such hazardous substances;**
- c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you;**
- d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;**
- e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you; and**
- f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.**

**ANSWER:** Respondent respectfully objects to this Request as overbroad, unduly burdensome, beyond EPA’s statutory authority and not reasonably relevant to the IWI Inc. Site matter as it asks for information which is not reasonably related to the identification, nature and quantity of hazardous subjects sent to the IWI Inc. Site. Respondent also objects to this request to the extent it asserts that 3M arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site. Rather, IWI was a 3M vendor that provided refurbishing and repair services in connection with IBCs, i.e., Intermediate Bulk Containers (trade name “Tote”), that formerly contained raw materials or intermediates. IBC capacity sizes most commonly used at 3M ranged from 275 – 350 gallons, stainless steel or aluminum. IBCs and other containers are regulated by the Department of Transportation (“DOT”) and are reused following cleaning and refurbishing pursuant to the DOT 52, 56 and 57 regulations. For those containers used for shipping materials over-the-road, such containers must be cleaned and refurbished on a two-year cycle and certified by the vendor.

**Respondent answers this Request as if directed to the IWI Inc. Site with the following information:**

**3M is performing a comprehensive and diligent investigation that has focused on five 3M facilities in response to the information request. Responsive documents indicate that 3M used the facility in 1978, 1980-1985 and in 1999.**

A phone audit of IWI Industries was conducted (apparently in 1984) by 3M employee, Gene Johnson (now deceased). Most of the IBC numbers reported for Knoxville, Cordova and Bedford Park below were based on the audit. The audit also contained the following information (see Exhibit B):

- IWI had been in business for 10 years
- IWI had 45 employees; Glen Wellman was 3M's contact
- IWI used a detergent – high pressure process
- All residue was sold:
  - Grease sold
  - Ink sold
  - Paint sold
  - Adhesives sold for 9 cents/lb. Blended with roofing materials and paving materials

The 1978 and 1980s are discussed first followed by 1999 transactions.

#### **3M St. Paul, MN**

Manufactured primarily transfer tapes for the automotive industry.

1978 35 (350 gal.) IBCs

3M facilities generally conduct pre-cleaning of IBCs before sending for refurbishing and certification. IBCs may have contained adhesives. The primary solvents used in the solvent-based adhesives would be heptane, mineral spirits and MEK.

#### **3M Knoxville, IA**

Manufactures tape products used in multiple industries including automotive, personal care and industrial applications. The products are primarily film or paper backed with adhesive coating that is converted into rolls and sheets.

1983 85 IBCs

1984 55 IBCs

1985 76 IBCs

Facility would conduct pre-cleaning of IBCs before sending for refurbishing and certification. IBCs may have contained adhesive residues. The primary solvents used in the solvent-based adhesives would be heptane, toluene and MEK.

#### **3M Cordova, IL**

The facility is primarily an internal supplier to 3M Company producing over 400 products that are shipped to other locations. The largest group of products, by volume, are polymer adhesives that will ultimately be coated as Scotch Brand Magic Mending Tape, Post-it Brand Notes and Blue Masking Tape and others.

**1984 250 IBCs**

**Facility would conduct pre-cleaning of IBCs before sending for refurbishing and certification. IBCs may have contained acrylate monomer-based adhesives. Heptane was the primary solvent used as a carrier.**

**3M Bedford Park, IL**

**Manufactured masking and filament tapes in addition to specialty products such as diaper tabs. The facility ceased operations in 2002.**

**1980-1985 80 IBCs**

**The facility would conduct pre-cleaning of IBCs before sending for refurbishing and certification. IBCs may have contained adhesives. The primary solvents used in the solvent-based adhesives would be heptane, toluene and MEK.**

**In August of 1985, 3M discovered that IWI was the subject of an enforcement action by Illinois EPA. 3M ceased doing business with IWI and tried to find other vendors. Correspondence indicates 3M considered doing business with IWI again after IWI prevailed against EPA and was cleared of all wrong doing. However, no information was located indicating whether 3M conducted further business with IWI in the 1986 – 1998 time period.**

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**3M corporate purchasing records indicate that a vendor account was established for IWI in 1999 for 3M's Brownwood, TX facility. These records also indicate three (3) transactions occurred in early 1999.**

**3M Brownwood, TX**

**Manufactures reflective films and fabrics. The reflective films are used for road and street signing products, license plate sheeting, and for traffic control in road construction areas (barricades, reflective material on barrels and cones, etc.). The reflective fabrics are sewn or applied as trim to jogging suit components, tennis shoes, personnel vests in construction work zones, fireman bunker gear, etc.**

**1999 22 (500 gal.) IBCs**

**3M Brownwood sends totes to refurbishers for repair if an IBC is leaking. IBCs are used in the plant's manufacturing processes and do not need to be certified because they are not used for over-the-road shipping. Periodically, leaks occur around bottom drain valves or because of seam or weld failures. The IBC would be drained empty, taken out of service, given a pressure wash, and dried prior to sending it to a vendor for repairs. The IBC must be dry with no leakage prior to shipping in order to comply with DOT regulations. If any dried residual solution was left in or on the IBC, it would generally**

be of an alkyd or vinyl resin chemistry with other additives (such as plasticizers, UV absorbers, etc.).

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**Request 8. Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last five years.**

**ANSWER:** In accordance with a telephone conversation on August 30, 2005 between Jerome Kujawa, EPA Attorney, and George Ann Biros of 3M's Office of General Counsel, 3M hereby submits its 2004 Annual Report and 3M Facts – Year End 2004 (Exhibit C) along with the following one paragraph description of 3M's business that will be considered acceptable for Requests 8 and 9:

3M is a \$20 billion diversified technology company with leading positions in consumer and office, display and graphics; electronics and telecommunications; health care; industrial; safety, security and protection services; transportation and other businesses. 3M is one of the 30 stocks that make up the Dow Jones Industrial Average and also is a component of the Standard & Poor's 500 Index.

**Request 9. If Respondent is a Corporation, respond to the following requests:**

- a) Provide a copy of the Articles of Incorporation and By-Laws of the Respondent.
- b) Provide Respondent's audited financial statements for the past five fiscal years, including, but not limited to those filed with the Internal Revenue Service. If audited financial statements are not available, please state the reasons that they are not available, and provide the financial statements that management would review at the conclusion of each fiscal year.
- c) Identify all of Respondent's current assets and liabilities and the persons who currently own or are responsible for such assets and liabilities.
- d) Provide a list of any investments that the corporation may own. For example, any ownership in stock should list Corporate name, number of shares owned, and price at a current specific date. Ownership of real estate should itemize property location, type of property (land, office buildings, factory, etc.), size of property, purchase price, and current market valuation. These schedules should agree with financial statement presentations.

**ANSWER:** See Response to Request No. 8.



**Request 10. If Respondent is a Partnership, provide copies of the Partnership Agreement.**

**ANSWER: Not applicable.**

**Request 11. If Respondent is a Trust, provide all relevant agreements and documents to support this claim.**

**ANSWER: Not applicable.**

**Request 12. Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of totes, containers, drums, barrels, pails, or waste materials, including hazardous substances, at the Site or to the site or for transshipment through the Site. In addition, identify the following:**

- a) The persons with whom you or such other persons made such arrangements, including, but not limited to [provide list of transporters];**
- b) Every date on which such arrangements took place;**
- c) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the substance was used or the process which generated the substance which may have been stored in totes, containers, drums, barrels, or pails;**
- d) The owner of the totes, containers, drums, barrels, pails or waste materials or hazardous substances so accepted or transported;**
- e) The quantity of the totes, containers, drums, barrels, pails, or waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;**
- f) All tests, analyses, and analytical results concerning the totes, containers, drums barrels, pails, or waste materials;**
- g) The person(s) who selected the Site or transshipment of totes, containers, drums, barrels, pails, or waste materials through the Site as the place to which the waste materials or hazardous substances were to be transported;**

- h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
- i) Where the person identified in g. above intended to have such totes, containers, drums, barrels, pails, hazardous substances, or waste materials transported and all evidence of this intent;
- j) Whether the totes, containers, drums, barrels, pails, waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
- k) What was actually done to the totes, containers, drums, barrels, pails or waste materials or hazardous substances once they were brought to the Site;
- l) the final disposition of each of the totes, containers, drums, barrels, pails, or waste materials or hazardous substances involved in such transactions;
- m) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the totes, containers, drums, barrels, pails, or waste material and hazardous substances involved in each transaction;
- n) The type and number of totes, containers, drums, barrels, or pails in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such totes, containers, drums, barrels, pails or containers;
- o) The price paid for transport or disposal or treatment of each tote, container, drum, barrel, pail, waste material and hazardous substance;
- p) All documents containing information responsive to a) – o) above, or in lieu of identification of all relevant documents, provide copies of all such documents;
- q) All persons with knowledge, information, or documents responsive to a) – p) above.

**ANSWER:** Respondent objects to this request to the extent it asserts that Respondent arranged for disposal or treatment or arranged for transportation for disposal or

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**treatment of waste materials, including hazardous substances, at the IWI, Inc. Site. See General Responses; see Answer to Request 7.**

**The responses provided above are based upon, and therefore necessarily limited by, records still in existence and information presently recollected and thus far discovered in the course of preparing these answers. Respondent reserves the right to make changes to the answers if at any time more accurate information is discovered.**

## **Exhibit A**

**Tom Ashenmacher**  
**Reverse Supply Chain Services**

**George Ann Biros**  
**Office of General Counsel**

**Ed Getz**  
**Packaging Engineering**

**Ray Kenick**  
**3M Brownwood**

**Steve James**  
**3M Brownwood**

**Henry Lange**  
**3M Retiree**

**Julie McCarthy**  
**Credit Department**

**Mike Mazur**  
**3M Knoxville**

**Randy Norton**  
**3M Knoxville**

**Harlan Petty**  
**3M Knoxville**

**Jim O'Boyle**  
**3M Knoxville**

**Lynn Riemenschneider**  
**Sourcing Operations**

**Bob Ryner**  
**3M Cordova**

**Kris Thompson**  
**3M Knoxville**

**Kathy VanKeulen**  
**Sourcing Operations**

**Lyle Warning**  
**3M Retiree**

**Charles Pflager**  
**3M Retiree**

**Lloyd Goerke**  
**3M Retiree**

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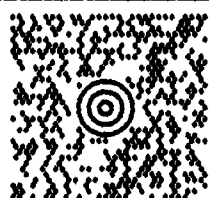
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ST. PAUL MN 55131

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SHIP TO: **EMERGENCY SUPPORT**  
US ENVIRONMENTAL PROTECTION AGENCY  
MRS. MILA V. BENSING  
EMERGENCY ENFORCEMENT & SUPPORT SEC  
77 WEST JACKSON BLVD.  
**CHICAGO, IL 60604**



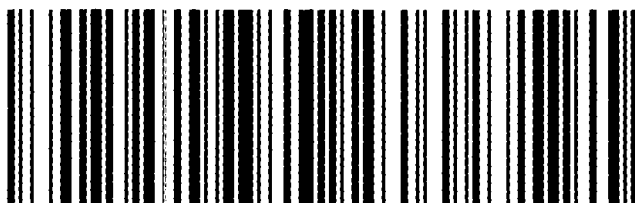
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